

1 ROB BONTA
2 Attorney General of California
3 PAULA L. BLIZZARD (SBN 207920)
Senior Assistant Attorney General
4 MICHAEL W. JORGENSEN (SBN 201145)
Supervising Deputy Attorney General
5 BRIAN D. WANG (SBN 284490)
CAROLYN D. JEFFRIES (SBN 319595)
Deputy Attorneys General
6 **OFFICE OF THE ATTORNEY GENERAL**
OF CALIFORNIA
7 455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004
Telephone: (415) 510-4400
9 Fax: (415) 703-5843
E-mail: Paula.Blizzard@doj.ca.gov
10 *Counsel for Plaintiff State of California*

11 Karma M. Julianelli (SBN 184175)
karma.giulianelli@bartlitbeck.com
12 **BARTLIT BECK LLP**
13 1801 Wewetta St., Suite 1200
Denver, Colorado 80202
14 Telephone: (303) 592-3100
15 *Co-Lead Counsel for Consumer Plaintiffs in In re Google Play Consumer Antitrust Litigation*

Glenn D. Pomerantz (SBN 112503)
glenn.pomerantz@mto.com
MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, Fiftieth Floor
Los Angeles, California 90071
Telephone: (213) 683-9100

Brian C. Rocca (SBN 221576)
brian.rocca@morganlewis.com
MORGAN, LEWIS & BOCKIUS LLP
One Market, Spear Street Tower
San Francisco, CA 94105-1596
Telephone: (415) 442-1000
Counsel for Defendants Google LLC et al.

Hae Sung Nam (*pro hac vice*)
hnam@kaplanfox.com
KAPLAN FOX & KILSHEIMER LLP
850 Third Avenue
New York, NY 10022
Telephone.: (212) 687-1980
Co-Lead Counsel for Consumer Plaintiffs in In re Google Play Consumer Antitrust Litigation

16
17 **UNITED STATES DISTRICT COURT**
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION
18

19 **IN RE GOOGLE PLAY STORE**
20 **ANTITRUST LITIGATION**

21 THIS DOCUMENT RELATES TO:
22 *State of Utah et al. v. Google LLC et al.*,
Case No. 3:21-cv-05227-JD
23 *In re Google Play Consumer Antitrust*
24 *Litigation*, Case No. 3:20-cv-05761-JD

Case No. 3:21-md-02981-JD

25 **STIPULATED [PROPOSED] ORDER**
GRANTING STATES' UNOPPOSED
ADMINISTRATIVE MOTION FOR AN
EXTENSION OF TIME TO FILE
SUPPLEMENTAL BRIEFING AND
FOR AN ORDER DIRECTING
GOOGLE TO DEPOSIT
SETTLEMENT FUNDS INTO
ESCROW

26 Judge: Hon. James Donato

27
28 Case Nos. 3:21-md-02981-JD;
3:21-cv-05227-JD; 3:20-cv-05761-JD

STIPULATED [PROPOSED] ORDER GRANTING STATES' UNOPPOSED ADMINISTRATIVE MOTION
FOR AN EXTENSION OF TIME TO FILE SUPPLEMENTAL BRIEFING AND FOR AN ORDER
DIRECTING GOOGLE TO DEPOSIT SETTLEMENT FUNDS INTO ESCROW

1 Plaintiffs in *State of Utah et al. v. Google LLC et al.*, Case No. 3:21-cv-05227-JD
 2 (“States”), Counsel for the class this Court had originally certified in *In re Google Play Consumer*
 3 *Antitrust Litigation*, Case No. 3:20-cv-05761- JD (“Consumer Counsel”), and Defendants
 4 Alphabet Inc., Google LLC, Google Ireland Limited, Google Commerce Limited, Google Asia
 5 Pacific Pte. Limited, and Google Payment Corp. (“Google”) (collectively, the “Settling Parties”),
 6 for reasons stated in the concurrently filed Administrative Motion for an Extension of Time to File
 7 Supplemental Briefing and for an Order Directing Google to Deposit Settlement Funds into
 8 Escrow, respectfully request from the Court (i) a three-week extension to the filing date for the
 9 supplemental briefing requested in the Court’s February 26, 2024 minute order, No. 21-cv-5227,
 10 ECF No. 543, and (ii) an order directing Google to deposit Settlement Funds into escrow pending
 11 the Court’s decision regarding notice dissemination.

12 The Settling Parties stipulate that the capitalized terms in this Stipulated [Proposed] Order
 13 have the meanings ascribed to them in the Settlement Agreement, attached as Exhibit A to the
 14 Declaration of Paula L. Blizzard in support of the Motion to Give Notice of Proposed *Parens*
 15 *Patriae* Settlement filed on December 18, 2023. No. 21-cv-5227, ECF No. 522-2.
 16

17 **NOW, THEREFORE, IT IS STIPULATED AND AGREED, SUBJECT TO THE**
 18 **APPROVAL OF THE COURT:**

- 19 1. The States and Google will file the supplemental briefs directed by the Court’s February
 20 26, 2024 minute order, Dkt. No. 944 in Case No. 21-md-02981, by April 17, 2024.
- 21 2. Within fifteen (15) days of the issuance of this Stipulated [Proposed] Order, Google shall
 22 transfer \$1,000,000 into the Settlement Fund Escrow Account for settlement notice and
 23 administration.
- 24 3. Within forty-five (45) days of the issuance of this Stipulated [Proposed] Order, Google
 25 shall transfer the additional sum of \$629,000,000 into the Settlement Fund Escrow
 26 Account.
- 27 4. Within forty-five (45) of the issuance of this Stipulated [Proposed] Order, Google shall

1 transfer \$70,000,000 into the States' Monetary Fund Escrow Account.
2
3

4 DATED: March 15, 2024

5 Respectfully submitted,

6 **OFFICE OF THE CALIFORNIA
ATTORNEY GENERAL**

7 By: /s/ Paula L. Blizzard

8 Paula L. Blizzard

9 *Counsel for the Plaintiff States*

10 **BARTLIT BECK LLP**

11 Karma M. Julianelli

12 **KAPLAN FOX & KILSHEIMER LLP**

13 Hae Sung Nam

14 By: /s/ Karma M. Julianelli

15 Karma M. Julianelli

16 *Co-Lead Counsel for Consumer Plaintiffs in In
re Google Play Consumer Antitrust Litigation*

17 **MUNGER, TOLLES & OLSON LLP**

18 Glenn D. Pomerantz

19 Kuruvilla Olasa

20 Jonathan I. Kravis

21 Justin P. Raphael

22 By: /s/ Glenn D. Pomerantz

23 Glenn D. Pomerantz

24 **MORGAN, LEWIS & BOCKIUS LLP**

25 Brian C. Rocca

26 Sujal J. Shah

27 Michelle Park Chiu

28 Minna Lo Naranjo

By: /s/ Sujal J. Shah

Sujal J. Shah

Counsel for Defendants Google LLC et al.

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.
2
3 Dated: _____
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

United States District Judge

E-FILING ATTESTATION

I, Brian Wang, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each signatory identified above has concurred in this filing.

/s/ Brian Wang